

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**JOINT MOTION TO CONTINUE SENTENCING HEARING DATE**

**NOW COMES** the United States of America, by and through its undersigned attorneys, and represents the following:

1. The Court has set a Sentencing Hearing in this matter for September 12, 2006 at 12:30 p.m.
  2. Undersigned counsel has a trial in another case scheduled before Judge Sleet on the date of the Sentencing Hearing in this matter. Undersigned counsel has spoken with the defendant's counsel, Samuel Rosenthal, Esq., who stated that he also had a case-related conflict with the Sentencing Hearing in this matter.
  3. As a result, the Government and the defendant jointly move that the Court continue the Sentencing Hearing in this matter to another upcoming date that is convenient for the Court. The Government and the defendant are jointly available on the following dates in the next few weeks: September 18 (all times other than 11:00 a.m. - 12:00 p.m.), September 19, September 22, September 28-29, October 2-3, October 10, October 11 (all times other than 4:30 - 6:00

p.m.), October 12 (all times other than 10:00 - 11:00 a.m.), October 13, October 16-18, October 19 (all times other than 9:00 - 10:00 a.m.) and October 20.

4. Defendant's counsel has authorized the Government to file this motion on behalf of both parties.

**WHEREFORE**, the United States and the defendant jointly request that the Court continue the Sentencing Hearing date and scheduled a new hearing date at the Court's convenience.

Respectfully submitted,

COLM F. CONNOLLY  
UNITED STATES ATTORNEY

BY: \_\_\_\_\_/s/  
Christopher J. Burke  
Assistant United States Attorney

Dated: August 30, 2006

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

## **ORDER**

AND NOW this \_\_\_\_ day of \_\_\_\_\_, 2006, it is hereby ordered that the parties' Joint Motion to Continue Sentencing Hearing Date be GRANTED, and that the Sentencing Hearing in this matter shall now be set for \_\_\_\_\_, 2006 at \_\_\_\_\_.

Honorable Joseph J. Farnan, Jr.  
United States District Judge

**IN THE UNITED STATES DISTRICT COURT  
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**CERTIFICATE OF SERVICE**

I, Christopher J. Burke, Assistant United States Attorney for the District of Delaware, hereby certify that on the 30th day of August, 2006, I caused to be electronically filed a **Joint Motion to Continue Sentencing Hearing Date** with the Clerk of the Court using CM/ECF. Said document is available for viewing and downloading from CM/ECF. I further certify that a copy of the foregoing was sent via U.S. mail to counsel of record as follows:

Samuel Rosenthal, Esq.  
Curtis, Mallet-Prevost, Colt & Mosle LLP  
1200 New Hampshire Ave, N.W.  
Suite # 403  
Washington, DC 20036-6808

/s/